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October 28, 2024

Via ECF

Honorable Thomas I. Vanaskie, Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower, 18th Floor
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation*, No. 1:19-md-02875 (D.N.J.)

Dear Judge Vanaskie:

Please accept this agenda letter on behalf of the Plaintiffs in advance of the
October 29, 2024 case management conference.

1. Schedule for the Six Selected Bellwether Trials.

Of the six bellwether cases that were scheduled to be worked up for trial, only
one case involved only ZHP API (Gaston Roberts) and the other five cases involved
ZHP API and Mylan and/or Aurobindo API. Currently, the liability expert reports,
briefing, and rulings for the ZHP API defendants have been largely completed, but
none of this work has been completed for the Mylan and Aurobindo defendants. To

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allow the Gaston Roberts case to proceed to trial expeditiously, while also allowing adequate time to develop the Mylan and Aurobindo liability experts, Plaintiffs propose separate schedules with staggered deadlines (one for Gaston Roberts and one for the other five selected bellwether cases).

Plaintiffs propose the following schedule for the six selected bellwether trials:

*Gaston Roberts – First trial September 2, 2025*¹

December 1, 2024	Amend Plaintiff Fact Sheet
March 1, 2025	Deadline for Plaintiff expert reports
April 1, 2025	Deadline for Defendant expert reports
April 15, 2025	Deadline for Plaintiff Rebuttal expert reports
June 1, 2025	Depositions of experts not already deposed on their opinions
June 15, 2025	Briefs for new <i>Daubert</i> expert challenges ²
July 1, 2025	Motions in Limine and MSJ
July 15, 2025	Opposition to <i>Daubert</i> expert challenges
July 29, 2025	Reply for <i>Daubert</i> expert challenges
August 1, 2025	Responses to Motions in Limine and MSJ
August 1, 2025	Exchange Witness and Exhibit List
August 8, 2025	Reply for Motions in Limine and MSJ
August 15, 2025	Exchange Proposed Jury Instructions
August 15, 2025	Exchange all other Materials per Pretrial Order, if any

¹ September 2, 2025 is the day after Labor Day. Plaintiffs assume that jury selection will proceed that week, and opening statements the following week, since it will be unnecessarily difficult to select a jury during the week prior to Labor Day.

² Plaintiffs disagree with Defendants' proposal to re-open *Daubert* challenges on general causation. Defendants have failed to proffer any reasonable argument for why the amendment to Rule 702 is of any significance here. Doing so will unnecessarily complicate the process leading to trial and should not be permitted.

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Other Five Cases – second trial March 1, 2026

December 1, 2024	Amend Plaintiff Fact Sheets
July 1, 2025	Deadline for Plaintiff expert reports, including Mylan and Aurobindo liability reports
August 1, 2025	Deadline for Defendant expert reports, including Mylan and Aurobindo liability reports
August 15, 2025	Deadline for Plaintiff Rebuttal expert reports
November 15, 2025	Depositions of experts not already deposed on their opinions
December 1, 2025	Briefs for new <i>Daubert</i> expert challenges
December 8, 2025	Motions in Limine and MSJ
December 15, 2025	Opposition to <i>Daubert</i> expert challenges
January 15, 2026	Reply for <i>Daubert</i> expert challenges
January 22, 2026	Responses to Motions in Limine and MSJ
February 1, 2026	Exchange Witness and Exhibit List
February 1, 2026	Reply for Motions in Limine and MSJ
February 15, 2026	Exchange Proposed Jury Instructions
February 15, 2026	Exchange all other Materials per Pretrial Order, if any

Respectfully,



Adam M. Slater
Plaintiffs' Liaison Counsel

Cc: Counsel of record (via ECF)